

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re Entresto (Sacubitril/Valsartan) Patent Litigation

C.A. No. 20-md-2930-RGA

NOVARTIS PHARMACEUTICALS
CORPORATION,

Plaintiff,

V.

ALKEM LABORATORIES LTD.,
AUROBINDO PHARMA USA INC.,
AUROBINDO PHARMA LTD., DR.
REDDY'S LABORATORIES, INC., DR.
REDDY'S LABORATORIES, LTD.,
HETERO USA INC., HETERO LABS
LIMITED, HETERO LABS LIMITED
UNIT III, LAURUS LABS LIMITED,
LAURUS GENERICS INC.,
MACLEODS PHARMACEUTICALS
LTD., MACLEODS PHARMA USA,
INC., TORRENT PHARMA INC.,
TORRENT PHARMACEUTICALS
LTD..

Defendants.

C.A. No. 21-1330-RGA

**DEFENDANTS' NOTICE OF DEPOSITION OF
PETER WAIBEL UNDER FED. R. CIV. P. 30(B)(1)**

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30(b)(1), the applicable Local Civil Rules for the United States District Court for the District of Delaware, and the Court’s Orders in this case, Defendants Hetero USA Inc., Hetero Labs Limited, and Hetero Labs Limited Unit III (collectively, “Hetero”); Macleods Pharmaceuticals Ltd. and Macleods Pharma USA, Inc. (collectively, “Macleods”); and Torrent Pharma Inc. and Torrent Pharmaceuticals Ltd.

(collectively, “Torrent,” and collectively with Hetero and Macleods, “Defendants”), by and through their respective counsel, will take the deposition upon oral examination of Peter Waibel. The deposition will be held remotely on June 14, 2023 at 9:00 am (ET) or as otherwise may be mutually agreed upon by the parties, before a court reporter, notary public, or other person authorized by law to administer oaths, and will continue from day to day until complete.

The deposition will be conducted in accordance with the Federal Rules of Civil Procedure and applicable Local Rules of the United States District Court for the District of Delaware, and will continue from day to day until completed, with such adjournments as may be necessary. The deposition will be conducted before a Notary Public or other officer authorized to administer oaths and will be recorded by stenographic and/or videographic means. The testimony taken pursuant to this Notice of Deposition may be used for any and all appropriate purposes as provided by the Federal Rules of Civil Procedure and Federal Rules of Evidence.

Dated: June 5, 2023

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/s/ April M. Ferraro

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